



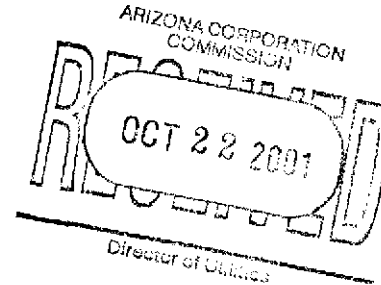
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AZ CORP COMMISSION  
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October 19, 2001



Arizona Corporation Commission  
Utilities Division  
1200 West Washington  
Phoenix, Arizona 85007

Re: Arizona 271 docket no. T-00000A-97-0238

Dear Sir or Madam:

Enclosed for filing in the above referenced docket is the original and ten (10) copies of *Covad Communications Company's Motion for Extension of Time*.

Please contact me at 720-208-3354 with any questions concerning this filing.  
Thank you.

Sincerely,

Adrienne M. Anderson  
Paralegal

Enclosures

Arizona Corporation Commission  
**DOCKETED**

OCT 22 2001

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BEFORE THE ARIZONA CORPORATION COMMISSION

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**CARL J. KUNASEK**

**Chairman**

**JIM IRVIN**

**Commissioner**

**WILLIAM A. MUNDELL**

**Commissioner**

**IN THE MATTER OF THE  
INVESTIGATION INTO  
US WEST COMMUNICATION,  
INC.'S COMPLIANCE WITH  
THE § 271 OF THE  
TELECOMMUNICATIONS ACT  
OF 1996**

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**DOCKET NO. T-00000A-97-0238**

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**COVAD COMMUNICATIONS COMPANY'S  
MOTION FOR EXTENSION OF TIME**

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Covad Communications Company ("Covad") respectfully requests an extension of time to file its Arizona performance data.

1. Pursuant to the Procedural Order issued by Judge Rodda on September 21, 2001, the parties to this proceeding are required to submit performance data on October 22, 2001 for review and consideration during the November 5-8, 2001 workshop on the Functionality Report.

2. Contemporaneous with the issuance of that order, the Regional Oversight Committee authorized the retention of Liberty Consulting Group to undertake a region-wide data reconciliation process. As contemplated by the ROC, Qwest and CLECs, Liberty will be reconciling performance data provided by Qwest and any interested

CLEC for all PIDs, sub-measures and states identified by a CLEC. Relevant to this motion, Covad currently is participating in the Liberty reconciliation process, has identified several PIDs for which its seeks reconciliation of the Qwest and Covad performance data, and has included Arizona as one of the states for which performance data will be reconciled.

3. Currently, because (1) the Liberty data reconciliation process is still ongoing; (2) Covad will not complete its conversations with Liberty until Tuesday, October 23, 2001 and thus does not know what, if any additional data or changes Liberty requires; and (3) the Liberty reconciliation will not be completed until November 19, 2001, Covad's performance data is in flux. Accordingly, Covad requests an extension of three days, until and including October 25, 2001, in order to finalize, as completely as possible given the fact that the data reconciliation is still ongoing, its performance data.

4. An extension of the deadline will not prejudice any party nor will it impair Qwest's ability to prepare for the November 5-8, 2001 workshop since Covad's data previously has been provided to both Qwest and Liberty.

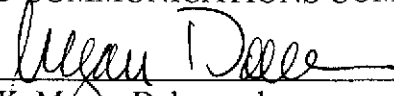
WHEREFORE, Covad requests an extension of time of 3 days, until and including October 25, 2001, to submit its performance data.

Dated this 19th day of October, 2001.

Respectfully submitted,

COVAD COMMUNICATIONS COMPANY

By:

  
K. Megan Doberneck  
Senior Counsel  
7901 Lowry Boulevard  
Denver, Colorado 80230

720-208-3636  
720-208-3256 (facsimile)  
e-mail: [mdoberne@covad.com](mailto:mdoberne@covad.com)

## CERTIFICATE OF SERVICE

I, Adrienne Anderson, hereby certify that an original and ten (10) copies of the Covad Communications Company's Motion for Extension, docket no. T-00000A-97-0238, were filed on this 19th day of October, 2001, to the following:

Arizona Corporation Commission  
Docket Control-Utilities Division  
1200 West Washington Street  
Phoenix, AZ 85007-2996

and a true and correct copy of Covad Communications Company's Motion for Extension of Time was served U.S. Mail delivery this 19th day of October, 2001, on the following:

Jerry Rudibaugh  
Hearing Officer  
Arizona Corporation Commission  
1200 West Washington Street  
Phoenix, AZ 85007

Maureen Scott  
Legal Division  
Arizona Corporation Commission  
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Phoenix, AZ 85007

Matt Rowell  
Utilities Division  
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Phoenix, AZ 85007

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Dunwoody, GA 30338

Charles Steese  
Andrew Crain  
Qwest Corporation  
1801 California Street, Suite 5100  
Denver, CO 80202

and a true and correct copy of Covad Communications Company's Motion for Extension of Time was sent via electronic mail; on this 19th day of October, 2001, to the following:

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